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January 6, 2025

VIA CM/ECF

Hon. James R. Cho
U.S. District Court for the Eastern District of New York
225 Cadman Plaza East
Brooklyn, NY 11201

Re: *Dowge International Development, Ltd. v. Barnathan*, Case No. 1:24-cv-04227

Dear Judge Cho,

The above firm currently serves as counsel to the Defendant in this action. We write to request an adjournment of the briefing schedule for Defendant's motion to dismiss, which is currently due to be served upon the Plaintiff on January 13, 2025.

As explained in Benesch's motion to withdraw filed earlier today, we have unfortunately had a breakdown in our communications with Defendant over the past month (in addition to payment issues). We were hopeful these issues would resolve in time to prepare and file a motion to dismiss, but that has not happened.

Thus, we are unable to effectively prepare and serve motion to dismiss on Defendant's behalf and respectfully request an adjournment of the briefing schedule pending resolution of our motion to withdraw as counsel.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "M. Fox", written in a cursive, stylized script.

MATTHEW FOX
Counsel for Defendant Albert Barnathan